

REMARKS

Claims 2, 4-13, 15, 17-26, 28, 30-39, and 41-44 were presented for examination. The final Office Action dated September 9, 2005 and Advisory Action dated November 22, 2005 rejects all claims. This paper accompanies a Request for Continued Examination and amends claims 41-44. Support for the amendments appears generally throughout the Applicants' specification and particularly on page 27, lines 10-11, and on page 28, lines 3-6. Claims 2, 4-13, 15, 17-26, 28, 30-39, and 41-44 remain pending in the application.

Rejection under 35 U.S.C. 103(a)

The final Office Action rejects claims 2, 4, 5, 7-10, 12, 15, 17, 18, 20-23, 25, 28, 30, 31, 33-36, 38, and 41-44 under 35 U.S.C. 103(a) as being unpatentable over Bertin (U.S. Patent No. 5,678,167), in view of Schneider (U.S. Patent No. 6,785,728). Applicants respectfully traverse this rejection because Bertin and Schneider, whether taken alone or in combination, do not disclose, teach, or suggest every element and limitation of the Applicants' invention as now claimed.

In pertinent part, the Applicants' invention, as set forth in representative claim 41, implements a filter having matching criteria that specifies a network address. The filter limits access to a resource to a network device associated with a network address that matches the network address specified by

matching criteria. In automated response to determining that a second network device requests access to the resource, the matching criteria are modified to specify a range of network addresses. The filter then grants access to the resource to any network device associated with a network address within the range of network addresses specified by the matching criteria.

Unlike the Applicants' invention, Bertin's does not grant or deny access to a resource based on a match between a network address of a requesting source user and a network address specified by the matching criteria. Instead, Bertin's filters operate to grant or deny access based on whether there is sufficient capacity currently available to support the requesting source user. Moreover, Bertin does not modify its matching criteria to specify a range of addresses in automated response to determining that a second network device requests access to the resource, as now set forth in the Applicants' claimed invention.

Schneider discloses an access filter that allows a user to access a resource by determining whether the IP address of that user is within a range of IP addresses (i.e., the user belongs to a predefined user group). However, the Applicants' invention is more than just a filter that grants access to multiple network devices within a range of addresses – the Applicants' invention is an automated filter aggregation process in which a filter that limits

access to a single network device can automatically change into a filter that grants access to multiple network devices in automated response to determining that a second network device requests access to a given resource.

In contrast, Schneider is not an automated filter aggregation process; Schneider does not disclose or suggest modifying the matching criteria of a filter to specify a range of addresses in automated response to determining that a second network device requests access to the resource, as now set forth in the Applicants' claimed invention. Rather, in Schneider, an access filter is based on an administrator-specified range of IP addresses (i.e., a pre-defined user group). Schneider's access filter remains unchanged until an administrator uses a workstation to modify the user group (col. 23, lines 9-52) or an access control database (col. 35, line 65-67 to col. 36, line 30). These manual processes cannot reasonably be seen to teach or suggest modifying the matching criteria in automated response to determining that a second network device requests access to the resource, as claimed by the Applicants. Thus, any combination of Schneider and Bertin fails to disclose or suggest every element and limitation of the Applicants' claimed invention. Therefore, Applicants respectfully submit that the rejection is overcome.

Independent claims 42-44 are amended to recite language similar to the language recited in claim 41. Therefore, these independent claims are

also patentably distinguishable over the cited references for at least those reasons provided in connection with claim 41. In addition, dependent claims 2, 4, 5, 7-10, 15, 17, 18, 20-23, 25, 28, 30, 31, 33-36, and 38 depend directly or indirectly from one of the patentable independent claims 41-43, and incorporate all of their respective limitations, and therefore are also patentably distinguishable over the cited references for at least this reason. Therefore, the Applicants respectfully submit that the rejection against these claims is also overcome.

Rejection of Claims 6, 13, 19, 26, 32, and 39 under 35 U.S.C. 103(a)

The Office Action rejects claims 6, 13, 19, 26, 32, and 39 under 35 U.S.C. 103(a) as being unpatentable over Bertin in view of Schneider, and further in view of Hegde (U.S. Patent No. 6,570,875). Dependent claims 6, 13, 19, 26, 32, and 39 depend directly or indirectly from patentable independent claim 41-43, and incorporate all of its respective limitations, and therefore are also patentably distinguishable over the cited references for at least this reason. Therefore, the Applicants respectfully submit that the rejection against these claims is also overcome.

Rejection of Claims 11, 24, and 37 under 35 U.S.C. 103(a)

The Office Action rejects claims 11, 24, and 37 under 35 U.S.C. 103(a) as being unpatentable over Bertin in view of Schneider, and further in view of Ellesson (U.S. Patent No. 6,459, 682). Dependent claims 11, 24, and 37 depend directly or indirectly from patentable independent claims 41-43, and incorporate all of their respective limitations, and therefore are also patentably distinguishable over the cited references for at least this reason. Therefore, the Applicants respectfully submit that the rejection against these claims is also overcome.

CONCLUSION

In view of the arguments made herein, Applicants submit that the application is in condition for allowance and requests early favorable action by the Examiner.

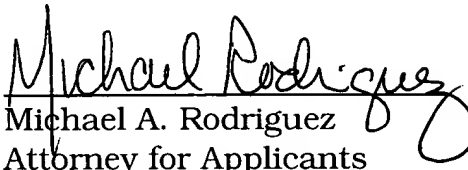
If the Examiner believes that a telephone conversation with the Applicants' representative would expedite allowance of this application, the Examiner is cordially invited to call the undersigned at (508) 303-2003.

Authorization is hereby granted to apply any credits or fees due in this case not covered by check to Deposit Account 50-2295.

Respectfully submitted,

Date: 12-9-05
Reg. No. 41,274

Fax No.: (508) 303-0005
Tel. No.: (508) 303-2003


Michael A. Rodriguez
Attorney for Applicants
Guerin & Rodriguez, LLP
5 Mount Royal Avenue
Marlborough, MA 01752